

LAGOMARSINO LAW

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*Attorneys for Plaintiff**Michael Leon Williams***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

MICHAEL LEON WILLIAMS, individually,

Plaintiff,

vs.

STATE OF NEVADA, *et al.*,

Defendants.

CASE NO.: 3:22-cv-00430-CLB

**ORDER GRANTING STIPULATION TO
EXTEND DEADLINES****(SEVENTH REQUEST)****AND ALL RELATED CLAIMS.**

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys that the deadline for Defendants' Opposition to Plaintiff's Motion in Limine (ECF No. 67), be continued to September 2, 2025, the Dispositive Motion cut-off date of September 10, 2025 be continued to September 17, 2025, and the Joint Pretrial Order deadline be extended to October 24, 2025.

The parties met and conferred via telephone on August 26, 2025 and agreed on the following:

The current deadline for Defendants to file their response to Plaintiff's Motion in Limine (ECF No. 67) is August 25, 2025. The parties request an extension of seven (7) days, making the new deadline September 2, 2025.

The current deadline for Dispositive Motions is September 10, 2025. The parties request an extension of seven (7) days, making the new deadline September 17, 2025.

Pursuant to LR 26-1(b)(5), the deadline to file the Joint Pretrial Order ("JPTO") is thirty (30) days after the deadline for dispositive motions, or thirty (30) days after the Court's ruling on

1 any dispositive motions if such motions are filed. The current deadline for filing the JPTO is
2 September 10, 2025. The parties request an extension of the JPTO deadline by thirty-seven (37)
3 days, as it is currently set for the same day as the Dispositive Motion deadline (ECF No. 65),
4 making the new deadline October 17, 2025.

5 **I. STATEMENT OF GOOD CAUSE AND EXCUSABLE NEGLECT**

6 This stipulation is submitted pursuant to FRCP 6(b)(1)(B) and LR IA 6-1, on the grounds
7 of excusable neglect and good cause. There is currently an ongoing statewide outage, which blocks
8 the Attorney General's Office's VPN access. Therefore, Counsel for Defendant is unable to access
9 case files and documents. Defendants' counsel has been unable to consistently work on any cases
10 or obligations, including this one. The Court has been informed by General Counsel of the issue.
11 Due to the outage, Defendants were unable to file their response to Plaintiff's Motion in Limine
12 (ECF No. 67), and the deadline passed on August 25, 2025.

13 The parties agree that an extension will not prejudice either side, will not cause undue
14 delay in the proceedings, and is made in good faith. The length of delay is minimal, and the parties
15 are prepared to proceed diligently under the new deadlines.

16 This is the parties' seventh request to extend case deadlines. The parties submit that good
17 cause exists for this request, as the extension will allow time to adequately prepare any response to
18 ECF No. 67, dispositive motions, and the JPTO if no dispositive motions are filed.

19 Given these factors, the Parties respectfully request that the Court find the instant late
20 Stipulation a result of excusable neglect and grant the extension on the following deadlines.

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V. PROPOSED EXTENDED DEADLINES

	<u>Current</u>	<u>Proposed</u>
Deadline to file Response to Plaintiff's Motion in Limine (ECF No. 67)	8/25/2025	Tuesday, September 2, 2025
Deadline to file Dispositive Motions	9/10/2025	Wednesday, September 17, 2025
Deadline to file Joint Pretrial Order	9/10/2025	Friday, October 17, 2025, or thirty (30) days following the Court's ruling on any dispositive motion, whichever is later

IT IS SO STIPULATED AND AGREED.

DATED this 26th day of August, 2025.

DATED this 26th day of August, 2025.

LAGOMARSINO LAW

ATTORNEY GENERAL

/s/ Taylor N. Jorgensen

/s/ Samuel L. Pezone

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Attorneys for Defendants

ORDER

IT IS SO ORDERED.

IT IS HEREBY ORDERED that the parties' Stipulation to Extend the Deadline to File Defendants' Response to Plaintiffs' Motion in Limine, File Dispositive Motions, and File Joint Pretrial Order (Seventh Request) is GRANTED.

The deadline for filing a Response to Plaintiff's Motion in Limine is extended to Tuesday, September 2, 2025.

The deadline for filing Dispositive Motions is extended to September 17, 2025.

The deadline for filing the Joint Pretrial Order is extended to October 17, 2025, or thirty (30) days following the Court's ruling on any dispositive motion, whichever is later.



UNITED STATES MAGISTRATE JUDGE

DATED: August 26, 2025

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